

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT)
SYSTEMS, LLC,)
Plaintiff,)
v.) Case No.: 1:24-cv-00246-CEA-CHS
QUALTIM, INC., et al.,)
Defendants.)

**PARAGON'S MOTION FOR LEAVE TO FILE A SUR-REPLY
IN OPPOSITION TO DEFENDANTS' MOTIONS TO SEAL DOCUMENTS**

Under Fed. R. Civ. P. 7(b) and this Court's LR7.1(d), Plaintiff Paragon Component Systems, LLC ("Paragon") respectfully seeks leave to file a short sur-reply in opposition to Defendants' reply brief (refiled three times, Docs. 80-82) to their motions to seal (Docs. 74-75).

There is good cause for this request. First, Defendants waited until their reply brief to present new evidence and arguments in violation of LR7.1(c), and a sur-reply would provide Paragon with a fair opportunity to respond. Relatedly, Defendants submitted two new declarations with their reply and then late-filed a third declaration, all dated the same day but substantively different. This issue should be addressed so the Court can decide which declaration should be operative if any. Third, a sur-reply is necessary to address inaccurate factual assertions and arguments raised for the first time on reply, which would aid the Court's decisional process.

While Paragon certainly does not want to burden the Court with more paper, given the significant issues raised for the first time through Defendants' reply, a short sur-reply would benefit the Court and streamline the issues for the hearing scheduled on July 18th. A proposed sur-reply is attached as **Exhibit A**.

Respectfully submitted this 10th day of July 2025.

s/ Stephen E. Kabakoff

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CERTIFICATE OF SERVICE

I certify that on July 10, 2025 a copy of the foregoing Plaintiff's Motion for Leave to File Sur-Reply is being served on all counsel of record by electronically filing it via the Court's filing system.

s/ Erin E. Steelman